

# **EXHIBIT A**

1 UNITED STATES DISTRICT COURT

2 CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

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4  
5 MARK SNOOKAL, an individual, )

6 Plaintiff, )

7 v. )

NO. 2:23-cv-6302-

HDV-AJR

8 CHEVRON USA, INC., a California )  
9 Corporation, and DOES 1 through )  
10 10, inclusive, )

Defendants. )  
\_\_\_\_\_ )

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16  
17 Videotaped deposition of MARK JORDAN

18 SNOOKAL, Plaintiff, taken on behalf of Defendants  
19 at 333 South Hope Street, 43rd Floor, Los Angeles,  
20 California, commencing at 10:00 a.m. on Friday,  
21 May 10, 2024, before John M. Taxter, Certified  
22 Shorthand Reporter No. 3579 in and for the State  
23 of California, a Registered Professional Reporter.  
24  
25

1 APPEARANCES OF COUNSEL:

2  
3  
4 FOR PLAINTIFF MARK JORDAN SNOOKAL:

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15 -and-

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19

20  
21 VIDEOGRAPHER:

22 GIGI FADICH  
23  
24  
25

1           A     That is correct. 11:10:18

2           Q     Okay. And did you have any 11:10:18

3           conversations with anybody else from Chevron about 11:10:20

4           this topic? 11:10:22

5                     And I'm not referring to, you know, 11:10:24

6           later with Mr. Powers. I -- I mean about the 11:10:27

7           topic of what it would -- what would happen with 11:10:29

8           this -- this job in Escravos and why you weren't 11:10:31

9           going to get it. 11:10:35

10          A     I talked -- so when I first received 11:10:37

11          information that I had been deemed not fit for 11:10:43

12          duty, I reached out to my coordination team. I 11:10:46

13          don't remember the person that had been assigned 11:10:51

14          to me, but I just -- I wrote an e-mail and asked 11:10:53

15          if there was any way to contest the decision. 11:10:55

16          They weren't aware of any. 11:11:01

17                     So I reached out to the Chevron omsbud 11:11:02

18          to ask the same question. I don't believe I went 11:11:06

19          into any level of detail with either one. The 11:11:10

20          omsbud is the one that got me in contact with, I 11:11:13

21          believe it was, Dr. Frangos who is the equivalent 11:11:18

22          of Dr. Levy in the U.S., covers the North America 11:11:22

23          business units, and Dr. Frangos got me in touch 11:11:27

24          with Dr. Levy. So other than that, I haven't had 11:11:32

25          any conversations. 11:11:35

1 determination that you were not fit for duty in 11:22:17  
2 Escravos? 11:22:20  
3 A If I recall correctly, it was when I 11:22:21  
4 received this form via e-mail which was on -- I 11:22:22  
5 believe that it was on the date that it's signed 11:22:29  
6 there, August 15th. 11:22:30  
7 Q Okay. And you testified that you 11:22:31  
8 reached out to the ombud -- right? -- after 11:22:36  
9 your -- 11:22:41  
10 A Not -- no. That wasn't the first step. 11:22:42  
11 The first step was to reach out to the medical 11:22:45  
12 liaison to ask them if there was a -- a way to ask 11:22:48  
13 for a second -- 11:22:51  
14 Q You -- 11:22:51  
15 A -- or a review. 11:22:53  
16 Q You had said that, and the medical 11:22:54  
17 liaison said they weren't aware of any? 11:22:56  
18 A Correct. So then I reached out to the 11:22:58  
19 ombud. 11:22:59  
20 Q The ombud. That's who put you in touch 11:23:01  
21 with Dr. Frangos who put you in touch with 11:23:02  
22 Dr. Levy? 11:23:05  
23 A Correct. 11:23:06  
24 Q Did you have any subsequent discussions 11:23:06  
25 with the ombud about any of this, the 11:23:08

1 determination or anything else? 11:23:12

2 A Even if I did, they're confidential. 11:23:13

3 Q Well, I meant essentially was the ombud 11:23:16

4 putting you in touch with the people you should 11:23:19

5 talk to? 11:23:20

6 A Yes. 11:23:20

7 Q Okay. And Dr. Frangos, same thing? He 11:23:21

8 just put you in touch with Dr. Levy? 11:23:23

9 A Correct. 11:23:25

10 MS. LEAL: Is this a good time for a 11:23:32

11 break? 11:23:34

12 MR. MUSSIG: Sure. Yeah. 11:23:34

13 THE VIDEOGRAPHER: Before we go off the 11:23:35

14 record, Counsel, would you like to waive the 11:23:37

15 federal rule that requires the opening read-on to 11:23:40

16 be read at the beginning of each new media? 11:23:44

17 MR. MUSSIG: Defendant will, yes. 11:23:46

18 MS. LEAL: Plaintiff will, as well. 11:23:48

19 THE VIDEOGRAPHER: Video deposition off 11:23:50

20 the record at 11:23 a.m., conclusion of media 1. 11:23:51

21 (Recess.) 11:23:56

22 THE VIDEOGRAPHER: Video deposition 11:37:22

23 returning to the record at 11:37 a.m., beginning 11:37:24

24 of media 2. 11:37:28

25 BY MR. MUSSIG: 11:37:29

1 STATE OF CALIFORNIA )  
 ) SS.  
2 COUNTY OF VENTURA )

3 I, John M. Taxter, a California Certified  
4 Shorthand Reporter, Certificate No. 3579, a  
5 Registered Professional Reporter, do hereby  
6 certify:

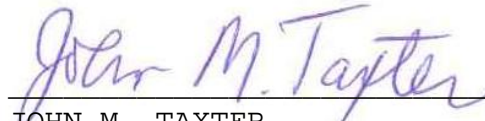
7 That the foregoing proceedings were taken  
8 before me at the time and place therein set forth,  
9 at which time the deponent was put under oath by  
10 me; that the testimony of the deponent and all  
11 objections made at the time of the examination  
12 were recorded stenographically by me and were  
13 thereafter transcribed; that the foregoing is a  
14 true and correct transcript of my shorthand notes  
15 so taken.

16 I further certify that I am neither counsel  
17 for nor related to any party to said action.

18 The dismantling, unsealing, or unbinding of  
19 the original transcript will render the Reporter's  
20 Certificate null and void.

21 Pursuant to Federal Rule 30(e), transcript  
22 review was requested.

23 Dated May 22, 2024.

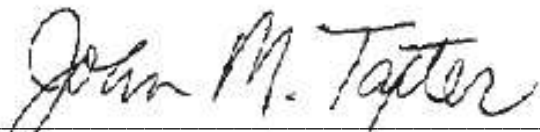
24   
25 JOHN M. TAXTER  
California Certified Shorthand  
Reporter No. 3579, RPR

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I, John M. Taxter, Certified Shorthand Reporter,  
CSR No. 3579, hereby certify:

The foregoing is a true and correct copy of the  
original transcript of the proceedings taken by me  
as thereon stated.

Dated: May 23, 2024

  
\_\_\_\_\_  
John Taxter, CSR No. 3579